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Attorney for Defendant

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON

UNITED STATES OF AMERICA,

No. 3:16-cr-00051-BR-03

Plaintiff,

v.

JOINT STATUS REPORT:
DISPUTED DISCOVERY
ITEMS 11 & 12 (Doc. 699)

JOSEPH O'SHAUGHNESSY,

Defendant.

Defendant Joseph O'Shaughnessy, through counsel Amy Baggio, and on behalf of all defendants, hereby provides the following joint status report regarding Disputed Discovery Items 11 & 12 from Doc. 699.

CERTIFICATION OF CONFERRAL: Undersigned counsel Amy Baggio provided Assistant United States Attorney Geoffrey Barrow with a copy of this Joint Status Report: Disputed Discovery Items 11 & 12. Mr. Barrow agrees that this report adequately states the positions of the parties.

STATUS UPDATE: On behalf of the all defendants, undersigned counsel has conferred with AUSA Geoffrey Barrow regarding Disputed Discovery Issues 11 (agents-provocateurs) and 12 (propaganda) as set forth in the previous Status Report regarding Disputed Discovery (Doc. 699 at 9-10) and as referenced in the Court's Order (Doc. 726 at 8-9) and provides the following update.

Mr. Barrow conducted additional inquires of relevant agents/agencies and communicated his findings to the defendants through undersigned counsel. Based on this updated information and representations by the government, there do not appear to be disputes at this time as to the items as described in the Joint Status Report (Doc. 699 at 9-10). Should a dispute arise based on additional distributions of discovery, the parties will make best efforts to resolve those disputes informally, but will bring any unresolved disputes to the Court's attention in a timely manner.

The parties further clarify for the record that this Joint Status Report does not apply to Defendant Ritzheimer's Motion to Compel (Doc. 697), items 15, 16, and 17.

Respectfully submitted on June 24, 2016.

/s/ Amy Baggio
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Attorney for Defendant O'Shaughnessy